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Attorneys for Defendant
BRENDA M. O. CHUNG (02)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 02-00225DAE(02)
)	
Plaintiff,)	DEFENDANT CHUNG'S (02)
)	PROPOSED VOIR DIRE
vs.)	QUESTIONS; CERTIFICATE
)	OF SERVICE
ANDY S. S. YIP, (01))	
BRENDA M. O. CHUNG, (02))	Trial: August 15, 2007
)	Judge: David Alan Ezra
Defendants.)	
)	
)	

DEFENDANT CHUNG'S (02) PROPOSED VOIR DIRE QUESTIONS

Defendant Brenda M. O. Chung (02), hereby submits her following
proposed voir dire questions:

1. Have you, any family members or friends ever been employed
by, or connected with, any federal, state, or local law enforcement agency? This

includes the City or State police or sheriff's departments, the U.S. Marshall's Service, the Federal Bureau of Investigation, the Drug Enforcement Agency, or any other law enforcement agency?

2. Have you or any family members or friends ever worked for the United States government or the State of Hawaii? Please tell us about your or their experience.

3. Have you or any family members or friends ever worked for the Internal Revenue Service or the Hawaii State Department of Taxation or the Department of Taxation of any other State, city, or municipal organization? Please tell us about your or their experience.

4. Have you or any family members or friends ever been audited by the Internal Revenue Service or any State or City tax department? Please tell us about your or their experience.

5. Have you or any family members or friends ever been investigated or otherwise questioned about any matter by the Internal Revenue Service or any State or City tax department? Please tell us about your or their experience.

6. Do you have any opinions about the tax system in the United States or the State of Hawaii that may affect your ability to be a fair and impartial juror?

7. Have you or any family members ever owned a business? If so, who was the person or persons who owned the business and what type of business was it?

8. Have you or any family members or friends ever worked for or owned companies that were involved in the buying and/or selling of jewelry? Please tell us about that. Would that fact affect your ability to be a fair and impartial juror in this case?

9. Have you or anyone you know ever worked for or done business with any companies that were involved in the jewelry business? Please tell us about that. Would that fact affect your ability to be a fair and impartial juror in this case?

10. Have you read, saw or heard anything about this case? As a result of what you read, saw or heard, have you formed any opinions about the Defendants or this case?

11. Do you believe that either Defendant Andy Yip or Brenda Chung broke any laws or did anything illegal? If so, why do you believe this?

12. In a case where the government has accused Defendants Andy Yip and Brenda Chung of violating laws involving the Internal Revenue Service,

would you start out favoring either the government or the Defendants? If so, please explain.

13. Can you think of anything, other than what you have told us in response to my questions, that may affect your ability to be a fair and impartial juror in this case?

DATED: Honolulu, Hawaii, August 1, 2007.

/s/ Howard K. K. Luke
HOWARD K. K. LUKE
DAVID M. HAYAKAWA

Attorneys for Defendant
BRENDA M. O. CHUNG (02)